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PARALEGAL  
Maria Nunez, B.S.

June 22, 2023

**Via ECF**

Honorable Naomi Reice Buchwald  
United States District Court Judge  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, NY 10007

Re: United States of America v. Juan Nolasco -Martinez, et al.  
22-CR-00008 (NRB)

Your Honor:

We write, at the Court's direction, in furtherance of the defendant's urgent request to be reinstated to release conditions (pre-sentence) so that he can attend to his Father, whose death is imminent in the next few days.

Following his arrest, and prior to his plea, Mr. Nolasco Martinez was released on conditions which permitted him to leave the house for work, medical, church, Court or attorney visits. He was relieved of electronic monitoring some months ago.

As for the instant request, we request that the Court set home confinement conditions except to visit his father in the Hospital and to attend any LOCAL funeral services. The Court can direct that the Defendant be produced *post haste* before the Court and given these conditions and then released until his sentencing date, which is only a few weeks away.

Thank you.

As now articulated, this application essentially is one for reargument of the Court's decision remanding the defendant, pursuant to 18 U.S.C. 3143, following his plea of guilty approximately two months ago. As such, the application is denied.

Yours truly,

*John L. Russo*

John L. Russo (JR6200)

**SO ORDERED.**

  
NAOMI REICE BUCHWALD

UNITED STATES DISTRICT JUDGE

Dated: June 22, 2023

New York, NY

Cc: AUSA Patrick Moroney (Via ECF)